

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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	:
THE AMERICAN AUTOMOBILE	: 11 Civ. 5655
ASSOCIATION, INC.,	:
	:
Plaintiff,	: <b>JOINT MOTION</b>
v.	: <b>REQUESTING</b>
C&R AUTOMOTIVE, INC. d/b/a AAA-1 TOWING	: <b>ADJOURNMENT OF</b>
and MICHAEL SCHMELTZER, an individual,	: <b>DISCOVERY CONFERENCE</b>
	:
Defendants.	:
	: <b>ECF CASE</b>
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Plaintiff, The American Automobile Association, Inc. (“AAA”) and Defendants C&R Automotive, Inc. d/b/a AAA-1 Towing and Michael Schmeltzer (“Defendants”) jointly move this Court to adjourn the discovery conference scheduled for Wednesday, January 25, 2012 at 10 a.m.

There have been no previous requests for adjournment. Defendants previously requested and Plaintiff agreed to a thirty (30) day extension of time for Defendants to respond to the Complaint. That request was granted.

Adjournment is necessary because the parties are close to reaching a settlement of this matter and expect to have the settlement finalized by February 1, 2012. The parties jointly

agree to this motion to request adjournment in order to finalize the details of the settlement. The parties will immediately inform the Court if either: (i) a settlement is reached or (ii) the settlement negotiations prove unsuccessful and the conference thus needs to be rescheduled.

January 23, 2012

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January 23, 2012

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